

FILED IN THE
U.S. DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON

MAR 02 2021

SEAN F. McAVOY, CLERK
DEPUTY
SPOKANE, WASHINGTON

Joseph H. Harrington
Acting United States Attorney
Eastern District of Washington
Stephanie Van Marter
Assistant United States Attorney
Post Office Box 1494
Spokane, WA 99210-1494
Telephone: (509) 353-2767

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WASHINGTON

UNITED STATES OF AMERICA,

Plaintiff,

v.

JONATHAN SCOTT ARD,
JORDIN LEMUS, and
JERROD JUSTIN HALE

Defendants.

4:21-CR-6008-SMJ
INDICTMENT

Vio.: 21 U.S.C. §§ 841(a)(1),
(b)(1)(A)(vi), 846
Conspiracy to Distribute 400
grams or more of Fentanyl
(Count 1)

21 U.S.C. § 841(a)(1),
(b)(1)(B)(vi), 18 U.S.C. § 2
Possession with the Intent to
Distribute 40 Grams or more
of Fentanyl
(Count 2)

21 U.S.C. § 853
Forfeiture Allegations

The Grand Jury charges:

COUNT 1

Beginning on a date unknown, but by December 2020, and continuing until
on or about March 2, 2021 in the Eastern District of Washington and elsewhere,
the Defendants, JONATHAN SCOTT ARD, JORDIN LEMUS, and JERROD
JUSTIN HALE, and other individuals, both known and unknown to the Grand

1 Jury, did knowingly and intentionally combine, conspire, confederate and agree
 2 together with each other to commit the following offense: distribution of 400
 3 grams or more of a mixture or substance containing a detectable amount of
 4 N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (a/k/a Fentanyl), a
 5 Schedule II controlled substance, in violation of 21 U.S.C. §§ 841(a)(1),
 6 (b)(1)(A)(vi), 846.

7 COUNT 2

8 On or about December 13, 2020, in the Eastern District of Washington, the
 9 Defendant, JONATHAN SCOTT ARD, knowingly and intentionally possessed
 10 with intent to distribute 40 grams or more of a mixture or substance containing a
 11 detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide
 12 (aka Fentanyl), a Schedule II controlled substance, in violation of 21 U.S.C.
 13 § 841(a)(1), (b)(1)(B)(vi).

14 NOTICE OF CRIMINAL FORFEITURE ALLEGATIONS

15 The allegations contained in this Indictment are hereby re-alleged and
 16 incorporated by reference for the purpose of alleging forfeitures.

17 Pursuant to 21 U.S.C. § 853, upon conviction of an offense of violation of 21
 18 U.S.C. §§ 841(a)(1), (b)(1)(A)(vi), (b)(1)(B)(vi), 846, as charged in this Indictment, the
 19 Defendants, JONATHAN SCOTT ARD, JORDIN LEMUS, and JERROD JUSTIN
 20 HALE, shall forfeit to the United States of America, any property constituting, or
 21 derived from, any proceeds obtained, directly or indirectly, as the result of such offense
 22 and any property used or intended to be used, in any manner or part, to commit or to
 23 facilitate the commission of the offense.

24 If any forfeitable property, as a result of any act or omission of the
 25 Defendants:

- 26 a. cannot be located upon the exercise of due diligence;
- 27 b. has been transferred or sold to, or deposited with, a third party;
- 28 c. has been placed beyond the jurisdiction of the court;

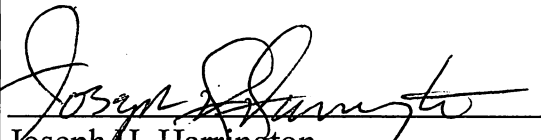
d. has been substantially diminished in value; or


e. has been commingled with other property which cannot be divided
without difficulty,

the United States of America shall be entitled to forfeiture of substitute property
pursuant to 21 U.S.C. § 853(p).

DATED this 2 day of March 2021.

A TRUE BILL


Joseph H. Harrington
Acting United States Attorney


Stephanie Van Marter
Assistant United States Attorney